

Illinois Performance Measure Report
Condition 30

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PERFORMANCE MEASURES REPORT

1. Introduction

This Commission's Order in the SBC/Ameritech merger proceeding established certain requirements relative to the implementation of performance measures and penalties. Specifically, the Commission provided as follows:

4. *Within 150 days following the Merger Closing Date, the task force will complete its initial review of performance measurements/standards/benchmarks/remedies with the collaborative participants. One hundred and fifty days after the Merger Closing Date, the Joint Applicants shall submit to the Commission for approval a written report detailing the timeline for implementing each of the performance measures, associated standards/benchmarks, and remedies, or an explanation of why SBC/Ameritech contend that implementation any particular measurement, standard/benchmark, or remedy is infeasible. The Commission may grant waivers from certain measurements, standards/benchmarks, and remedies, and shall determine the value of each missed measurement, and standard/benchmark in the event that SBC/Ameritech does not implement a particular measurement or standard/benchmark, or that it does not seek a waiver from such a requirement within 300 days of the Merger Closing Date. Liquidated damages for failure to implement the performance measures shall not exceed \$90 million. Merger Order, p. 257.*

In addition, the Merger Order established a two-phased collaborative process to review the Texas 122 performance measures, associated standards/benchmarks, and remedies as the target for initial implementation by Ameritech Illinois. The scope of the two phases of this collaborative reflected the terms of the Commission's Order and Staff's determination as to the proper sequencing of the issues. The following three issues were the subject of the first phase of this collaborative process:

- (1) an implementation schedule for the Texas measures;
- (2) identification of any technically infeasible measures; and
- (3) a review of the use of parity vs. benchmark standards for performance.

Phase Two of the collaborative process, to begin on March 28, will address any modifications to the Texas performance measures proposed by CLECs, the remedy plan, and any proposals for additional performance measures.

As will be explained in more detail in the body of this report, the participants in the collaborative process reached substantial agreement on most of the issues. First, the collaborative participants reviewed the implementation schedule established by Ameritech Illinois with no objection. This schedule proposes that the performance measurements be implemented well in advance of the three hundred day deadline instituted by the Illinois Commerce Commission in the Merger Order. The schedule also commits to a rolling implementation for the Texas remedy plan based on the schedule for implementation of the performance measures, also to be completed in advance of the three-hundred day deadline.

Second, after review by the participants in the collaborative, agreement was reached that 6 of the 122 Texas performance measures are technically infeasible. Ameritech Illinois will seek a waiver relative to implementing these six measures.

Third, after the collaborative participants reviewed the Texas measures that have a benchmark rather than parity as the standard, agreement or interim agreement was reached on measures for which a benchmark is appropriate. The only exceptions were three measures that address Firm Order Confirmations (FOCs). Based on these results, Ameritech will seek Commission approval of a benchmark standard for the FOC measures.

The completion of these discussions and this report represent a successful conclusion to the initial stage of the collaborative process as developed by the Illinois Commerce Commission Staff. The discussions and agreements forged in this stage set the framework for additional work to proceed in future collaborative sessions, the first of which is scheduled for March 28, 2000. Ameritech is committed to work with the Competitive Local Exchange Carriers (CLECs) participants and Commission Staff in the next stage of collaboratives to determine whether any modifications need to be made to the Texas performance plan. Attachment A to this document summarizes the agreements developed during this collaborative process.

2. Implementation Schedule and Listing of Texas Performance Measures

In implementing the Texas performance measures, Ameritech Illinois is using Version 1.6 of the Texas Business Rules dated 7/20/99. This set of performance measures was in place at the merger close date.

Ameritech Illinois provided CLEC participants with a Draft Implementation Schedule at the initial collaborative meeting on January 6, 2000. The schedule has since been modified to reflect updates initiated by Ameritech Illinois as well as those required to implement the agreed-upon measures changed from benchmark to parity comparisons.

The schedule defines the date on which the data will first be collected for each performance measure, the date that the performance measure will first be implemented on the SBC Performance Measures Web-site, and the date (data month) that Ameritech has agreed to implement Tier 1 (CLEC) and Tier 2 (state) remedies. Ameritech Illinois intends to implement the remedy plan as defined in the Texas collaborative, subject to any modification which may result from the Phase 2 collaborative.

As of March 1, 2000, Ameritech Illinois has implemented forty-one (41) of the Texas performance measures. The remedies associated with the initial performance measures will begin with the May data month, which will be reported in June. Ameritech Illinois expects to have 97 (77%) of the measurements implemented on the SBC Performance Measure Web-site by April 1, 2000. Ameritech also expects to have all of the measures implemented by the end of June. This schedule exceeds the requirements established in the Merger Order. The implementation schedule is included in Attachment B.

3. Technically Infeasible Measures

At merger closing Ameritech established a task force to develop a plan to implement the Texas Performance Measurement Business Rules, version 1.6 dated July 20, 1999. The task force was comprised of experts from various areas of the business within Ameritech and selected Subject Matter Experts from Southwestern Bell Telephone (SWBT). A team of consultants from Arthur Andersen was also engaged to assist in managing the project.

The task force also worked to identify those performance measures that were considered “problematic” for Ameritech Illinois to implement. These measures were documented for the Commission based on the requirements of condition 30 paragraph 6 and filed within 7 days of Merger Close Date (October 14, 1999). The listing of those eleven measures identified in October 1999 as “problematic” are documented as Attachment D to this document. Additional study and discussion with the SWBT experts allowed Ameritech Illinois to narrow this list to the six (6) measures currently considered to be “technically infeasible”. The CLEC participants at the collaborative sessions discussed these measures and agree that they are technically infeasible. Ameritech will seek a waiver for implementation of these measures from the Illinois Commerce Commission in a separate filing.

These measures are divided into two general categories:

1) Measures for systems which Ameritech Illinois has not deployed

SBC #3 EASE Average Response Time

The Easy Access Sales Environment (EASE) system is a proprietary system deployed by SBC, which supports ordering of POTS residence and business telephone service. SBC retail service representatives and wholesale (resale) customers utilize this system.

Ameritech Illinois has not deployed EASE and does not currently offer an EASE-like system, which provides direct access to ordering. Ameritech’s mechanized ordering functions are accomplished via the Electronic Data Interchange (EDI) interface, which has been operational since 1996. EDI functions are captured in other ordering measures within the SBC Texas performance measures. It is therefore infeasible for Ameritech to provide SBC measure #3, “EASE Average Response Time”, since Ameritech Illinois does

not offer EASE or a similar system. Should Ameritech Illinois deploy EASE or an EASE-like system coincident with merger conditions on OSS, Ameritech Illinois would initiate work to implement an Average Response Time measurement.

2) **Measures for products that Ameritech Illinois no longer offers**

Interim Number Portability (INP) SBC #87,88,89,90,116

- #87 Percentage Installations Completed Within "X" (3, 7, 10) Days - INP
- #88 Average INP Installation Interval
- #89 Percentage INP Only I-Reports Within 30 Days
- #90 Percent Missed Due Dates (INP Only)
- #116 Percentage of Missed Mechanized INP Conversions

Ameritech Illinois was among the national leaders in the deployment of Long Term Number Portability (LNP). Interim Number Portability (INP), utilized prior to the widespread availability of LNP in Illinois, was discontinued as a product offering in the Ameritech region effective June 14 1999. SBC continues to offer INP and therefore has several performance measures that target processes supporting INP. Long term Number Portability (LNP) processes are reflected in other performance measures within the Texas plan that will be implemented in Illinois (#91 through #101).

4. Parity vs. Benchmark

Although the Commission accepted the Joint Applicants' commitment to import to Illinois the "Texas plan" for 122 performance measures and incident-based liquidated damages provisions, it required certain additional showings by the Joint Applicants. The Texas plan contains "parity" measures for the majority of the operations being measured -- *i.e.*, the Company's wholesale performance is compared to its own retail operations or the retail operations of an affiliate. Where retail analogs are not readily available, the Texas plan provides for "benchmarks" - *i.e.*, an objective measure is established for completion of the operation in terms of seconds, hours, or other appropriate measure of timely performance. Of the 122 Texas performance measures, 62 were based on benchmarks.

In the Merger Order, the Commission made clear that parity measures were preferred. The Commission stated that benchmarks were only to be used if no retail analogs existed and that the burden of proof remained on the Joint Applicants:

"Additionally, all performance measures must be based on comparison to performance that the Joint Applicants provide to their own operations and/or subsidiaries. The burden of proof shall remain on the Joint Applicants to demonstrate that no retail analogs exist and that benchmarks should be substituted."
Merger Order, p. 221.

The parties to the collaborative developed a retail analog for 19 of the 62 Texas measures which were based on benchmarks. Thus, a parity standard will be implemented for those measures in Illinois.

After an extensive review by the Company, Staff and the CLECs through the collaborative process, there is general agreement among the parties that 40 of the Texas benchmark measures and parts of 2 others should continue to be based on benchmarks, at least at the outset. Five of these 42 benchmark measures are interim in nature and will be revisited by the parties participating in the collaborative this June, to determine whether the benchmark is appropriate. In addition, with respect to two of the interim benchmark measures, the Company and the CLECs agreed to change the benchmark to impose a more rigorous standard on the Company. Attached to this document are the approved collaborative meeting minutes from January 6 and January 18-19. (Attachment F)

There are only three benchmark measures on which the parties to the collaborative could not reach agreement and they all relate to Firm Order Confirmation (“FOC”) response time. This subject is discussed in detail in Section 5 following.

The following chart summarizes the performance measures that will be based on benchmarks. The chart identifies the performance measure and summarizes why a retail analog is not available. A more detailed explanation of the measures themselves is contained in Attachment C. As explained previously, there is no dispute over the use of benchmarks for these performance measures.

Parity/Benchmark Charts

The following table represents the forty-two performance measurements where, through discussion, evaluation, and compromise, CLECs and Ameritech agree that a benchmark should be utilized as a standard rather than a retail analog. A summary of the issues addressed in evaluating each measurement as to whether and why a retail analog was not selected is included under the column labeled Discussion.

SBC#	Measure Name	Discussion
1	Average Response Time for OSS Pre-Order Interfaces	The average response time for Pre-order transactions is similar to Ameritech’s retail response time. The differentiation is essentially in the nature of access because CLECs access via an interface while Ameritech has direct access to the systems. The response time standards established in the Texas business rules are not dissimilar than those associated with Bell Atlantic's standard of parity plus 4 seconds, with some bettering those standards. Four of the six disaggregations in this measure offer benchmarks of six or less seconds. CLECs agreed to a benchmark as the standard for this measure. This measure is required by the FCC merger agreement.
SBC#	<u>Measure Name</u>	Discussion

2	Percent Responses Received within "x" seconds-OSS Interfaces	The "percent within" measurement requires a different, somewhat longer standard than the average response time measurement, however four of the six disaggregations are for 95% responses in less than sixteen seconds, while another is 95% in less than 25 seconds. The differentiation is essentially in the nature of access because CLECs access via an interface while Ameritech has direct access to the systems. CLECs agreed to a benchmark as the standard for this measure.
4	OSS Interface Availability	This measurement represents, in some cases, both the back end legacy systems and the interface itself, while the retail environment does not deal with the CLEC interface. Therefore there is not a retail analog. CLECs agreed to a benchmark as the standard for this measure. This measure is required by the FCC merger agreement.
7	Percent Mechanized Completions Returned Within one hour of Completion in ACIS	There is no retail analog for a completion notice since a completion notice is not sent to the retail service center once an order is complete. Ameritech cited the FCC's finding in Bell Atlantic's application for long-distance relief in New York, where they upheld the state commission's finding that "order completion notification lacks a retail analogue." Bell Atlantic 271 Order, 186 n.591. CLECs proposed and Ameritech accepted a change in the benchmark from 97% to 99% on an interim basis (until June) as a compromise. This benchmark will be re-evaluated in June.
7.1	Percent Mechanized Completions Returned Within one Day of Work Completion	There is no retail analog for a completion notice since a completion notice is not sent to the retail service center once an order is complete. Ameritech cited the FCC's finding in Bell Atlantic's application for long-distance relief in New York, where they upheld the state commission's finding that "order completion notification lacks a retail analogue." Bell Atlantic 271 Order, 186 n.591. CLECs proposed and Ameritech accepted a change in the benchmark from 97% to 99% on an interim basis (until June) as a compromise. This benchmark will be re-evaluated in June.
8	Average Time to Return Mechanized Completions	There is no retail analog for a completion notice since a completion notice is not sent to the retail service center once an order is complete. Ameritech cited the FCC's finding in Bell Atlantic's application for long-distance relief in New York, where they upheld the state commission's finding that "order completion notification lacks a retail analogue." Bell Atlantic 271 Order, 186 n.591. CLECs proposed and Ameritech accepted a change in the benchmark from 97% to 99% on an interim basis (until June) as a compromise. This measure is a diagnostic measure and will be re-evaluated with 7 and 7.1 in June.

SBC#	<u>Measure Name</u>	Discussion
9	Percent Rejects	There is no retail analog for a rejection notice since no such rejection notice is sent to Ameritech retail service representatives. Ameritech Service Representatives input service orders directly into the ordering system and not via an interface. Edits in that process stop the retail service representative from inputting the service order at the point of error, rather than rejecting the order. The rejection notice is an interface function reflecting the "carrier to carrier" relationship. Ameritech also cited the FCC's finding in Bell Atlantic, which stated that there are no retail analogs for this function. CLECs agreed to a benchmark as the standard for this measure.
10	Percent Mechanized Rejects Returned within 1 Hour of Receipt of Reject in MorTel	There is no retail analog for a rejection notice since no such rejection notice is sent to Ameritech retail service representatives. Ameritech Service Representatives input service orders directly into the ordering system and not via an interface. Edits in that process stop the retail service representative from inputting the service order at the point of error, rather than rejecting the order. The rejection notice is an interface function reflecting the "carrier to carrier" relationship. Ameritech also cited the FCC's finding in Bell Atlantic, which stated that there are no retail analogs for this function. CLECs agreed to a benchmark as the standard for this measure.
10.1	Percent Mechanized Rejects Returned within 1 Hour of Receipt of Reject in of LSR from CLEC	There is no retail analog for a rejection notice since no such rejection notice is sent to Ameritech retail service representatives. Ameritech Service Representatives input service orders directly into the ordering system and not via an interface. Edits in that process stop the retail service representative from inputting the service order at the point of error, rather than rejecting the order. The rejection notice is an interface function reflecting the "carrier to carrier" relationship. Ameritech also cited the FCC's finding in Bell Atlantic, which stated that there are no retail analogs for this function. CLECs agreed to a benchmark as the standard for this measure.
10.2	Percent Mechanized Rejects Received Electronically and Returned within 5 hours	There is no retail analog for a rejection notice since no such rejection notice is sent to Ameritech retail service representatives. Ameritech Service Representatives input service orders directly into the ordering system and not via an interface. Edits in that process stop the retail service representative from inputting the service order at the point of error, rather than rejecting the order. The rejection notice is an interface function reflecting the "carrier to carrier" relationship. Ameritech also cited the FCC's finding in Bell Atlantic, which stated that there are no retail analogs for this function. CLECs agreed to a benchmark as the standard for this measure.

SBC#	<u>Measure Name</u>	Discussion
10.3	Percent Manual Rejects Received Manually and Returned Within 5 Hours	There is no retail analog for a rejection notice since no such rejection notice is sent to Ameritech retail service representatives. Ameritech Service Representatives input service orders directly into the ordering system and not via an interface. Edits in that process stop the retail service representative from inputting the service order at the point of error, rather than rejecting the order. The rejection notice is an interface function reflecting the "carrier to carrier" relationship. Ameritech also cited the FCC's finding in Bell Atlantic, which stated that there are no retail analogs for this function. CLECs agreed to a benchmark as the standard for this measure.
11	Mean Time To Return Mechanized Rejects	There is no retail analog for a rejection notice since no such rejection notice is sent to Ameritech retail service representatives. Ameritech Service Representatives input service orders directly into the ordering system and not via an interface. Edits in that process stop the retail service representative from inputting the service order at the point of error, rather than rejecting the order. The rejection notice is an interface function reflecting the "carrier to carrier" relationship. Ameritech also cited the FCC's finding in Bell Atlantic, which stated that there are no retail analogs for this function. CLECs agreed to a benchmark as the standard for this measure.
11.1	Mean Time To Return Manual Rejects that are Received Electronically via LEX or EDI	There is no retail analog for a rejection notice since no such rejection notice is sent to Ameritech retail service representatives. Ameritech Service Representatives input service orders directly into the ordering system and not via an interface. Edits in that process stop the retail service representative from inputting the service order at the point of error, rather than rejecting the order. The rejection notice is an interface function reflecting the "carrier to carrier" relationship. Ameritech also cited the FCC's finding in Bell Atlantic, which stated that there are no retail analogs for this function. CLECs agreed to a benchmark as the standard for this measure.
11.2	Mean Time to Return Manual Rejects that are Received thru the Manual Process	There is no retail analog for a rejection notice since no such rejection notice is sent to Ameritech retail service representatives. Ameritech Service Representatives input service orders directly into the ordering system and not via an interface. Edits in that process stop the retail service representative from inputting the service order at the point of error, rather than rejecting the order. The rejection notice is an interface function reflecting the "carrier to carrier" relationship. Ameritech also cited the FCC's finding in Bell Atlantic, which stated that there are no retail analogs for this function. CLECs agreed to a benchmark as the standard for this measure.
15	Percent of Accurate and Complete Formatted Mechanized Bills	There is no retail analog to this function as Ameritech sends very few mechanized bills to its customers in the retail environment. This is a primarily a function which occurs as part of the carrier to carrier relationship. CLECs agreed to a benchmark as the standard for this measure.

SBC#	<u>Measure Name</u>	Discussion
16	Percent of Usage Records Transmitted Correctly	There are significant differences in the way usage is treated in the retail vs wholesale environment. Retail Usage is held until the end-user bill is generated, on a monthly basis. Wholesale usage is "transmitted" to the CLEC on a daily basis. Therefore there is no retail analog for this measure. CLECs agreed to a benchmark as the standard for this measure.
19	Daily Usage Feed Timeliness	There are significant differences in the way usage is treated in the retail vs. wholesale environment. Retail Usage is held until the end-user bill is generated. Wholesale usage is "transmitted" to the CLEC on a daily basis. CLEC usage is also aggregated from the thirteen Ameritech billing centers and sent to the CLECs as one file each day, which does not happen in the retail environment. Therefore there is no retail analog for this measure. CLECs agreed to a benchmark as the standard for this measure.
20	Unbillable Usage	Unbillable usage, by its nature is usage where the party who generated the usage is unknown. This usage may have been generated by either a wholesale or a retail customer, but the owner is indistinguishable and thus the usage will go unbilled. This is a diagnostic measure in Texas business rules. CLECs agreed to leave this a diagnostic measure and not to set a benchmark as the standard for this measure.
71	Common Transport Trunk Blockage	Common transport trunks do not differentiate between Ameritech traffic and Wholesale traffic, and transport all traffic in a common manner between Ameritech offices. Since this measure includes the blockage generated by the aggregate of all of this traffic, retail and wholesale combined, there is no retail analog. CLECs agreed to a benchmark as the standard for this measure.
72	Distribution of Common Transport Trunk Groups > 2%	Common transport trunks do not differentiate between Ameritech traffic and Wholesale traffic, and transport all traffic in a common manner between Ameritech offices. Since this measure includes the blockage generated by the aggregate of all of this traffic, retail and wholesale combined, there is no retail analog. CLECs agreed to a benchmark as the standard for this measure.
77	14 Average Trunk Restoration Interval for Service Affecting Trunk Groups	This measure attempts to measure the restoration interval for trunks in groups where the outage is considered service affecting (i.e. where 20% of the trunk group is in an out-of-service condition that causes trunk blockage. This is a fairly rare occurrence and CLECs agree that not enough volume may occur for a retail or Affiliate comparison on an ongoing basis. Therefore, CLECs agreed to a benchmark as the standard for this measure.

SBC#	<u>Measure Name</u>	Discussion
79	Directory Assistance Grade of Service	Operator Services/Directory Assistance (OS/DA) measurements do not distinguish retail from wholesale traffic. They are reported in the aggregate since the OS/DA operators cannot distinguish wholesale from retail traffic when answering calls. CLECs agreed to a benchmark as the standard for this measure. CLECs request that if changes in the network occur to allow for the distinction of calls between wholesale/retail Ameritech will segregate retail and wholesale reporting.
80	Directory Assistance Average Speed of Answer	Operator Services/Directory Assistance (OS/DA) measurements do not distinguish retail from wholesale traffic. They are reported in the aggregate since the OS/DA operators cannot distinguish wholesale from retail traffic when answering calls. CLECs agreed to a benchmark as the standard for this measure. CLECs request that if changes in the network occur to allow for the distinction of calls between wholesale/retail Ameritech will segregate retail and wholesale reporting
81	Operator Services Grade of Service	Operator Services/Directory Assistance (OS/DA) measurements do not distinguish retail from wholesale traffic. They are reported in the aggregate since the OS/DA operators cannot distinguish wholesale from retail traffic when answering calls. CLECs agreed to a benchmark as the standard for this measure. CLECs request that if changes in the network occur to allow for the distinction of calls between wholesale/retail Ameritech will segregate retail and wholesale reporting.
82	Operator Services Speed of Answer	Operator Services/Directory Assistance (OS/DA) measurements do not distinguish retail from wholesale traffic. They are reported in the aggregate since the OS/DA operators cannot distinguish wholesale from retail traffic when answering calls. CLECs agreed to a benchmark as the standard for this measure. CLECs request that if changes in the network occur to allow for the distinction of calls between wholesale/retail Ameritech will segregate retail and wholesale reporting
83	Percent Calls Abandoned	Operator Services/Directory Assistance (OS/DA) measurements do not distinguish retail from wholesale traffic. They are reported in the aggregate since the OS/DA operators cannot distinguish wholesale from retail traffic when answering calls. CLECs agreed to a benchmark as the standard for this measure. CLECs request that if changes in the network occur to allow for the distinction of calls between wholesale/retail Ameritech will segregate retail and wholesale reporting.

SBC#	<u>Measure Name</u>	Discussion
84	Percent Calls Deflected	Operator Services/Directory Assistance (OS/DA) measurements do not distinguish retail from wholesale traffic. They are reported in the aggregate since the OS/DA operators cannot distinguish wholesale from retail traffic when answering calls. CLECs agreed to a benchmark as the standard for this measure. CLECs request that if changes in the network occur to allow for the distinction of calls between wholesale/retail Ameritech will segregate retail and wholesale reporting
85	Average Work Time	Operator Services/Directory Assistance (OS/DA) measurements do not distinguish retail from wholesale traffic. They are reported in the aggregate since the OS/DA operators cannot distinguish wholesale from retail traffic when answering calls. CLECs agreed to a benchmark as the standard for this measure. CLECs request that if changes in the network occur to allow for the distinction of calls between wholesale/retail Ameritech will segregate retail and wholesale reporting
86	Non-Call Busy Work Volumes	Operator Services/Directory Assistance (OS/DA) measurements do not distinguish retail from wholesale traffic. They are reported in the aggregate since the OS/DA operators cannot distinguish wholesale from retail traffic when answering calls. CLECs agreed to a benchmark as the standard for this measure. CLECs request that if changes in the network occur to allow for the distinction of calls between wholesale/retail Ameritech will segregate retail and wholesale reporting
91	Percentage of LNP Only Due Dates within Industry Guidelines	Local Number Portability (LNP) is strictly a wholesale service and does not have a retail analog. CLECs agreed to a benchmark as the standard for this measure.
92	Percentage of Time the Old Service Provider Releases the Subscription Prior to the Expiration of the Second 9-Hour (T2) Timer	Local Number Portability (LNP) is strictly a wholesale service and does not have a retail analog. CLECs agreed to a benchmark as the standard for this measure.
93	Percentage of Customer Account Restructured Prior to LNP Due Date	Local Number Portability (LNP) is strictly a wholesale service and does not have a retail analog. CLECs agreed to a benchmark as the standard for this measure.
95	Average Response Time for Non-Mechanized Rejects Returned With Complete and Accurate Codes	Local Number Portability (LNP) is strictly a wholesale service and does not have a retail analog. CLECs agreed to a benchmark as the standard for this measure.
96	16 Percentage Pre-Mature Disconnects (Coordinated Cutovers)	Since the LNP process does not occur in the retail environment, CLECs agreed to a benchmark as the standard for this measure.

SBC#	Measure Name	Discussion
97	Percentage of Time Ameritech Applies the 10-digit Trigger Prior to the LNP Order Due Date	Local Number Portability (LNP) is strictly a wholesale service and does not have a retail analog. CLECs agreed to a benchmark as the standard for this measure.
100	Average Time of Out of Service for LNP Conversions	Local Number Portability (LNP) is strictly a wholesale service and does not have a retail analog. CLECs agreed to a benchmark as the standard for this measure.
101	Percent Out of Service < 60 Minutes	Local Number Portability (LNP) is strictly a wholesale service and does not have a retail analog. CLECs agreed to a benchmark as the standard for this measure.
110	Percentage of Updates Completed into the DA Database within 72 Hours for Facilities Based CLECs	Directory database updates are not generated manually for Ameritech retail customers. All flow through as a result of service orders. CLECs agreed to only compare electronic transactions to retail as a comparison. CLECs agreed to a benchmark as a standard for Manual D/A database updates.
111	Average Update Interval for DA Database for Facility Based CLECs	Directory database updates are not generated manually for Ameritech retail customers. All flow through as a result of service orders. CLECs agreed to only compare electronic transactions to retail as a comparison. CLECs agreed to a benchmark as a standard for Manual D/A database updates.
112	Percentage of DA Database Accuracy for Manual Updates	CLECs agree that no manual DA database updates occur in Ameritech retail, and therefore CLECs agreed to a benchmark as the standard for this measure.
114	Percentage of Premature Disconnects (coordinated cutovers)	CLECs and Ameritech could not agree as to whether there are useful retail analogs to use in the evaluation of coordinated cutovers. Therefore, CLECs and Ameritech agreed to utilize a benchmark comparison as an interim comparison until June. NextLink and Ameritech will work together to conduct a study to collect data on useful retail analogs.
115	Percentage of Ameritech Caused Delayed Coordinated Cutovers	CLECs and Ameritech could not agree as to whether there are useful retail analogs to use in the evaluation of coordinated cutovers. Therefore, CLECs and Ameritech agreed to utilize a benchmark comparison as an interim comparison until June. NextLink and Ameritech will work together to conduct a study to collect data on useful retail analogs.

The following table represents the nineteen performance measurements where, through discussion, evaluation, and compromise, CLECs and Ameritech agree that a parity comparison should be utilized as a standard rather than a benchmark, as described in the Texas business rules. A summary of the issues addressed in evaluating each measurement and an indication of the retail analog to be used, is included under the column labeled Discussion.

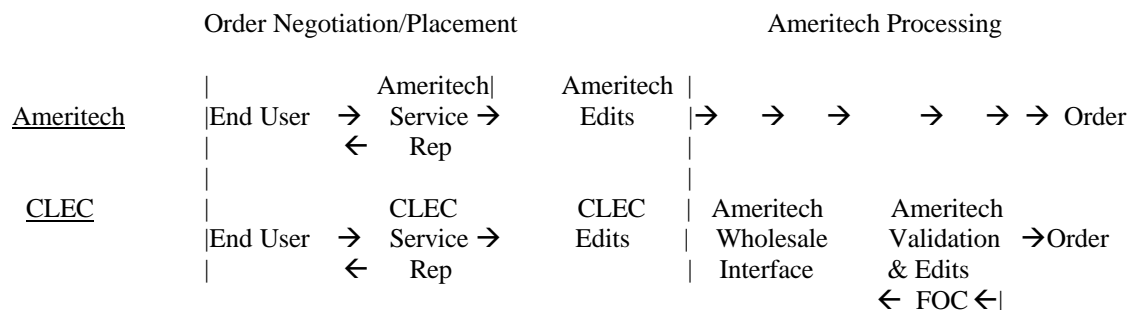
<u>SBC#</u>	<u>FCC#</u>	<u>Measure Name</u>	<u>Retail Comparison</u>
18	18	Billing Timeliness (Wholesale Bill)	Compare to Retail Bill process
34		Count of POTS Orders Canceled After the Due Date Which Were Caused by Ameritech	Agreed to compare to count of Retail orders canceled, caused by Ameritech.
51		Count of Special Service Orders Canceled After the Due Date Which Were Caused by Ameritech	Agreed to compare to count of Retail orders canceled, caused by Ameritech.
55		Average Installation Interval	Compare to Retail analogs as described in Measure #58
56	6c	Percent Installations Completed within "X" Days – UNE	Compare to Retail analogs as described in Measure #58
64		Count of UNE Orders Canceled After the Due Date Which Were Caused by Ameritech	Agreed to compare to count of Retail orders canceled, caused by Ameritech.
70	15	Percent Trunk Blockage	Compare to Ameritech Final Trunk Group Blockage
75		Percent SWBT Caused Missed Due Dates > 30 Days	Compare to Interoffice Trunk Provisioning
78		Average Interconnection Trunk Installation Interval	Compare to Interoffice Trunk Provisioning
105		Percentage of Requests Processed within 35 Days (Poles, Conduit, and ROW)	Agreed to compare to Ameritech Affiliate for Parity comparison.
106		Average Days to Process a Request (Poles, Conduit, and ROW)	Agreed to compare to Ameritech Affiliate for Parity comparison
107	17	Percentage of Missed Collocation Due Dates	Agreed to compare to Ameritech Affiliate on an interim basis (until June) to establish whether enough data exists to make ongoing comparison.
108		Average Delay Days for Ameritech Caused Missed Due Dates (Collocation)	Agreed to compare to Ameritech Affiliate on an interim basis (until June) to establish whether enough data exists to make ongoing comparison.

SBC#	FCC#	Measure Name	Discussion
109		Percent of Requests Processed Within Tariffed Timelines	Agreed to compare to Ameritech Affiliate on an interim basis (until June) to establish whether enough data exists to make ongoing comparison.
110		Percentage of Updates Completed into the DA Database within 72 Hours for Facilities Based CLECs	Agreed to compare to Retail Updates for electronic only orders. Manual orders to be measured against a benchmark.
111		Average Update Interval for DA Database for Facility Based CLECs	Agreed to compare to Retail Updates for electronic only orders. Manual orders to be measured against a benchmark.
113		Percentage of Electronic Updates that Flow Through the DSR Process Without Manual Intervention	Agreed to compare to Retail Updates for which are also all electronic.
120		Percentage of Requests Processed Within 30 Business Days	Parity with Ameritech Affiliates on an interim basis to be reviewed in June.
121		Percentage of Quotes Provided for Authorized BFRs Within 45 Business Days	Parity with Ameritech Affiliates on an interim basis to be reviewed in June.

5. Firm Order Confirmation

Ameritech Illinois' wholesale order interface ("EDI" for electronic orders) and wholesale service representatives (manual orders) and service representatives check CLEC orders for format and content. CLEC orders that are improperly formatted, or that do not contain necessary data, are returned to the CLEC with a rejection notice. Orders that are correct and accurate are confirmed. The purpose of the Firm Order Confirmation ("FOC") measurements is to assess the amount of time it takes Ameritech Illinois to notify the competing carrier that an order has been accepted as accurate and complete.

No retail analog exists for a FOC. The following diagram depicts the differences between the process in place for Ameritech Illinois' retail operations and those provided to CLECs.



1. The order negotiation/placement process is a similar process for both Ameritech and CLEC the retail environment. During this process the Service Representative (whether Ameritech or CLEC) work with the customer to identify what products and services will be ordered. During this time, they will access the necessary Pre-order interfaces such as those used to facilitate the assignment of telephone numbers, for checking the customer service record, or for reserving a due date.
2. At the end of the contact and, after addressing any system edits, the Ameritech retail representative will submit the order directly into the service order processing system. Acceptance of submitted service orders that pass all of the up-front edits in the system is nearly immediate (seconds).
3. At the end of the contact, and after addressing any CLEC system edits, the CLEC representative sends the order downstream to Ameritech. Due to the nature of the carrier to carrier relationship and the industry standard interface (EDI), the CLEC service representative requires a confirmation. Once the Ameritech systems and personnel have validated the accuracy and completeness of the service order, a confirmation is sent back to the CLEC.

To the extent that the CLECs wish to obtain direct access to the service order processing system which would eliminate the need for a separate edit/FOC function, the Commission's Merger Order already provides for it:

Direct Access to Service Order Processing Systems

In addition to the application-to-application and graphical user interfaces described herein, Ameritech Illinois will offer to develop and deploy direct access to Ameritech Illinois' service order processing systems for resold services, individual UNEs, and combinations of UNEs, provided that a CLEC requesting such direct access enters into a contract to pay Ameritech Illinois for 50% percent of the costs of development and deployment. The access developed will meet the requirements of 47 U.S.C. § 251(c)(3). Ameritech Illinois' offer to develop direct access to Ameritech Illinois' service order processing systems will be available for a period of 30 months after the Merger Closing Date, and Ameritech Illinois will agree to develop and deploy the interface contracted for within one year of a completed contract with the CLEC. Merger Order, pp. 186-187

The practice of comparing FOCs to a benchmarks is widely accepted. As part of the SBC/Ameritech merger conditions, the FCC approved these same FOC requirements as part of their carrier to carrier performance plan.

The FCC's *Bell Atlantic 271 Order* upheld the New York commission's conclusion that "there are no retail analogues" for order confirmations, and found that benchmarks "established in a collaborative proceeding" provide a sufficient basis for assessing performance. *Bell Atlantic 271 Order*, ¶ 160 n.490. In accordance with the FCC's finding, the measures from the Texas performance plan do not require a comparison to retail orders (because no comparison is possible).

However, in an effort to expedite a resolution to this issue, Ameritech Illinois has offered the CLECs a compromise as to how it will measure Firm Order Confirmations. Ameritech would agree to add another measurement of FOC response, similar to that which is offered in New York, to the Texas measurement plan being implemented in Illinois.

The current disaggregation of the FOC measurement in the Texas business rules does not differentiate performance for “flow-through” orders. “Flow through” orders are defined as those orders which are received electronically and also processed electronically.

Bell Atlantic measures the FOC response on orders processed electronically separately than for those which are received electronically and processed manually. Confirmations for “flow-through” orders are measured against a benchmark of two hours, while those received electronically and processed manually are measured against a benchmark of 24 hours. A comparison of the Bell Atlantic FOC benchmarks and the current Texas FOC benchmarks are attached to this document as Attachment E.

Ameritech Illinois offered, as a compromise, to implement a similar measurement for orders received and processed electronically, while comparing its performance to a one-hour benchmark instead of the two hours approved for Bell Atlantic. All electronically received orders would also continue to be measured against the five-hour standard as compared to Bell Atlantic’s twenty-four hour requirement.

Ameritech Illinois’ proposed benchmarks are consistent with those found “reasonable” by the FCC in its *Bell Atlantic 271 Order*. The New York benchmarks required Bell Atlantic to provide 95 percent of mechanized (flow-through) confirmation notices within two hours of submission and 95 percent of manually processed confirmation notices under ten lines within 24 hours of submission. *Bell Atlantic 271 Order*, ¶¶ 160 & 180.

In a separate filing, Ameritech will seek a waiver from the Illinois Commerce Commission for the implementation benchmarks as the standards for these measures.

Attachment A - Summary of Collaborative Agreements

Attachment B – Implementation Schedule

Attachment C – Modified (Illinois version) Texas Business Rules

Attachment D – Problematic Measures (10/14/99)

Attachment E – Bell Atlantic/Texas FOC Comparison

Attachment F – Collaborative Meeting Minutes